



August 1, 2002

By Electronic Filing

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: EX PARTE – WC Docket No. 02-150: Application by BellSouth for
Authorization to Provide In-Region InterLATA Services in Alabama,
Kentucky, Mississippi, North Carolina, and South Carolina

Dear Ms. Dortch:

In response to the questions of Commission staff on July 24, we have determined that the DUF rates for Alabama and South Carolina that WorldCom discussed in its Comments were those established by the state commissions. On May 30, BellSouth filed SGATs in South Carolina and Alabama with significantly lower DUF rates. WorldCom is in the process of attempting to have those rates included in its interconnection agreements.

As for deaveraging in South Carolina, WorldCom, along with the Competitive Coalition of New South, NuVox Communications, Broadslate Networks, ITC DeltaCom Communications, and KMC Telecom, presented arguments to the South Carolina Commission about the proper method of deaveraging on pages 34-36 of their post-hearing brief. Those pages are attached. WorldCom also cross-examined BellSouth's pricing witness Mr. Ruscilli about the proper method of deaveraging during the cost case. BellSouth included the transcript of that proceeding in the record (although it is missing one of the relevant pages). Transcript of Proceedings, BellSouth Telecommunications, Inc. v. AT&T of the Southern States, Inc., Docket No. 2001-209-C at 392-94 (S.C. Pub. Serv. Comm'n July 23, 2001) (BellSouth Joint Application, App. C, Tab 7).

Please feel free to give us a call with any further questions.

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Pursuant to the Commission's rules, I am filing an electronic copy of this letter and request that it be placed in the record of this proceeding.

Sincerely,

Keith L. Seat
Senior Counsel
Federal Advocacy

Attachment

cc (w/att.): Aaron Goldberger, Tamara Preiss, Monica Desai, Joshua Swift, Carol Canteen, Susan Pið, James Davis-Smith (DOJ), Honorable John Garner, Deborah Eversole, Brian Ray, Robert Bennick, Gary Walsh, Qualex International